

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\*\*\*\*\*  
YVETTE LOCKHART-BEMBERY, \*  
\*  
Plaintiff \*  
\*  
\*  
v. \*  
\* C.A. NO. 04-10581-PBS  
TOWN OF WAYLAND POLICE DEPARTMENT, \*  
ROBERT IRVING, in his capacity as CHIEF OF \*  
THE WAYLAND POLICE DEPARTMENT and \*  
DANIEL SAURO, \*  
\*  
\*  
Defendants \*  
\*\*\*\*\*

**JOINT STATEMENT**

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above named parties have conferred and state as follows:

**1. JOINT DISCOVERY PLAN AND MOTION SCHEDULE:**

The parties propose the following pre-trial schedule:

- (a) Automatic document disclosure to be completed on or before June 4, 2004;
- (b) Written discovery requests are to be filed by August 31, 2004, and answers/responses are to be filed within the time provided by the rules;
- (c) All depositions are to be completed by December 31, 2004, except for expert witnesses;

(d) The plaintiff's expert witnesses shall be designated by February 28, 2005 and plaintiff's expert witness report submitted by March 31, 2004. Defendants' expert witnesses shall be designated by April 30, 2004 and defendants' expert witness report submitted by May 30, 2004. Should plaintiff designate a medical expert, defendants shall have thirty (30) days thereafter to conduct a Rule 35 medical examination;

(e) All dispositive motions are to be filed by May 31, 2005, and responses are to be filed thirty (30) days thereafter pursuant to Local Rule 7.1;

(f) A final pre-trial conference will be held per order of the Court.

2. The parties will not need more than ten (10) depositions.

3. Certifications regarding each party's consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.

4. The parties are not willing to have this matter referred to a magistrate.

Defendants Town of Wayland, et al.,  
by their counsel,

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Respectfully submitted,  
Yvette Lockhart-Bemberry  
by his counsel,

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Date: May 7, 2004

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